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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MASON AND DIXON INTERMODAL,  
INC.,

Plaintiff,

v.

LAPMASTER INTERNATIONAL, LLC  
and HARTFORD INSURANCE CO.,

Defendants.

Case No. 3:08-cv-01232-VRW

**JOINT DISCOVERY PLAN**

Plaintiff Mason and Dixon Intermodal, Inc. and defendants Lapmaster International, LLC and Hartford Insurance Co. jointly submit this Discovery Plan.

- A. The parties will complete their initial disclosures on or before July 17, 2008.
- B. The parties propose the completion of fact discovery by January 30, 2009.

Discovery may be needed as to factual issues as follows:

- a. The cause and amount of the alleged damage to the Machines.
- b. The relationship between the various parties.
- c. Notice provided to the carrier regarding the size of the Machines.
- d. Applicability of a limitation of liability.
- e. The terms governing the transportation of the Machines
- f. Damages suffered by Lapmaster including loss of prospective economic opportunity.

1 C. Disclosure of Expert Witnesses:

2 a. Expert Disclosures required by Federal Rule of Civil Procedure 26(a)(2)(B)

3 Deadline: February 16, 2009.

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5 b. Rebuttal Expert Disclosure required by Federal Rule of Civil Procedure  
6 26(a)(2)(B) Deadline: March 16, 2009

7 c. Expert Discovery Deadline: April 16, 2009

8 D. Other Deadlines and Proposed Dates:

9 E. Dispositive Motions: May 16, 2009

10 F. At this time, the parties do not foresee any special issues arising in regard to  
11 disclosure and discovery of electronically stored information.

12 G. At this time, the parties do not foresee any special issues arising in regard to  
13 disclosure and discovery of electronically stored information.

14 H. At this time, the parties do not foresee any special issues arising in regard to  
15 claims of privilege or of protection of trial-preparation materials.

16 I. At this time, the parties do not see any need for changes to the limitations upon  
17 discovery imposed under the Federal Rules of Civil Procedure and Local Rules.  
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J. The parties do not request entry of any orders under Fed. R. Civ. P. 16(b) or 26(c).

Dated: June 25, 2008

KEENAN COHEN & HOWARD P.C.

GORDON & REES, LLP

By: /s/ Jeffrey D. Cohen

By: /s/ John F. Hughes

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**CERTIFICATE OF SERVICE**

I, the undersigned counsel, hereby certify that on June 25, 2008, a true and correct copy of the foregoing Joint Discovery Plan was filed electronically. Notice of this filing will be sent to the following parties, listed below, by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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